

CITY OF ROCHESTER, NEW YORK
Environmental Assessment for the Conversion of a Portion of Genesee Valley
Park under the Land and Water Conservation Fund Act as a Result of the
Brooks Landing Revitalization Project

2.0 ALTERNATIVES

The CEQ provides guidance on the development and analysis of alternatives under NEPA. A full range of alternatives, framed by the purpose and need, must be developed for analysis for any federal action. They should meet the project objectives, and should also be developed to minimize impacts to environmental resources. Alternatives should also be “reasonable,” meaning that they should be economically and technically feasible and should show evidence of common sense. Alternatives are not considered reasonable if they could not be implemented for economic or technical reasons or do not resolve the need for action and fulfill the stated purpose in taking action.

2.1 Alternative 1 - No Action

The CEQ specifies that one of the alternatives considered must be the “no action” alternative, or the continuation of present management actions. The “no action” alternative must be examined (1) because it is almost always a viable choice in the range of alternatives and (2) it sets a baseline of existing impact that may be projected into the future against which to compare impacts of action alternatives.

Area Proposed for Conversion Parcel

The existing roadway network, including that portion of South Plymouth Avenue that is classified as a park road, would remain in its current alignment through the park. Other than occasional maintenance, (resurfacing, etc.) no improvements will occur. The adjacent lawn areas/open space would receive periodic mowing. The existing trees would receive occasional maintenance in response to storm damage or decline. The river wall would continue to function as a retaining wall for South Plymouth Avenue and as bank stabilization for the river shore. The commercial areas comprising Sub-Areas II and III and a portion of Sub-Area I would most likely continue its trend to decline. Given the area’s 30-year history, there is no economic or social indication that positive significant change from the existing condition will occur. This is also based on repeated attempts at an economic development stimulus over the past twenty years.

In performing investigative activities for the project, the occurrence of impacted soil and groundwater was detected within Sub-Area I. Since the presence of this contamination is now known, Alternative 1 assumes that efforts would continue for cleanup, since this should occur even without the project (Alternative 2). There are many details regarding this cleanup that could only be speculative in projecting potential impacts for this alternative, such as the techniques to be used for cleanup and the impetus for the timing of the cleanup. Reference is made to Sections 3.2.11, 4.2, and 4.11 in particular.

Area Proposed for Replacement Parcel

The proposed replacement parcel would remain as a City-owned property. The Genesee Riverway Trail would extend through a portion of the parcel, but the City would be investigating other uses for the remainder of the parcel.

2.2 Alternative 2 –Brooks Landing Revitalization Project (Preferred)

2.2.1 Conversion Parcel

Alternative 2 consists of development of the Brooks Landing Revitalization Project in the Brooks Landing Urban Renewal District. This development will convert a 1.38 acre portion of Genesee Valley Park Section 6(f) protected parkland under the LWCF Act. Due to this, the NY State Historic Preservation Office has determined that the alienation/conversion of historic parkland will have an Adverse Effect on the Olmsted-designed Genesee Valley Park. Therefore, a Memorandum of Agreement (MOA) among the National Park Service, New York State Historic Preservation Office and the City of Rochester has been executed. For more information, refer to Section 4.6.

The project components have been separated into three areas (Exhibit A of Appendix D). Sub-Area I includes the extended-stay hotel, restaurant, public waterfront promenade and boat landing. Sub-Area II includes a new office/retail building. Sub-Area III includes new mixed-use infill development. A detailed site plan of Sub-Area I has been included as Figure 4.

The actions undertaken in the project area to create an Urban Renewal District consist of the following:

1. Acquire selected properties from private owners in Sub-Area I, II and III.
2. Seek parkland alienation from the New York State Legislature for private land development.
3. Dispose of project area development sites by sale to qualified developers for redevelopment or rehabilitation in accordance with standards incorporated by the Plan.
4. Demolish and remove selected structures on acquired property in Sub-Areas I, II and III.
5. Subdivide acquired land as follows:
 - Sub-Area I: Combine all project lots into two parcels to include one private development parcel and one parcel remaining as public parkland.
 - Sub-Area II: Combine all project lots into one private development parcel.
 - Sub-Area III: Combine 951 and 953 Genesee Street into one private development parcel.
Combine 923 and 927 Genesee Street into one private development parcel.
6. Provide relocation assistance in accordance with Federal Relocation Guidelines.

7. Design and construct modifications to the public street system.
8. Provide for a new promenade linked to the existing river trail system and provide for new public facilities to enhance the waterfront.

2.2.2 Sub-Area I.

A more specific description of the three aspects of development planned for Sub-Area I follows:

A. Brooks Landing Hotel and Restaurant Development (Private Development)

The project area required for the hotel and restaurant development is approximately 2.77 acres, which includes the 1.38-acre 6(f) conversion parcel. The development will include a 60±-foot high hotel with four stories and 61,200± SF of commercial space. The hotel will not include any residential units. The development will also include a 12-foot high restaurant building with 5,000± SF of commercial space and no residential units.

The development will include 167 parking stalls to accommodate the development, which includes 87 spaces for the hotel and 80 spaces for the restaurant. Walks, patios, decks, and landscaping features are also included in the design plan.

The hotel will be designed as slab-on-grade construction with concrete masonry unit (CMU) block or concrete foundation walls, with wood construction above grade for the hotel rooms and support areas. The exterior finish will be a combination of stone veneer cladding and EFIS (stucco-type) system, energy efficient windows and doors, and a shingle roof system.

The restaurant is conceived with caissons and slab-on-grade construction, CMU block or concrete foundation walls, wood construction above grade and an exterior finish of EFIS and stone system, energy efficient windows and doors, and a shingle roof system.

A number of options were explored in the development of the site configuration. A major physical constraint is the existence of a 54-inch sanitary force main running parallel to the river through the site. This line carries 12 to 15 million gallons per day of sewage from approximately 75,400 residents in nearby Gates, Chili and Ogden, New York to the Van Lare Sewage Treatment Plant at 1574 Lakeshore Boulevard (near Lake Ontario) in the Town of Irondequoit. The hotel could not be constructed over this force main, and it is not considered to be reasonable to move the force main. The construction cost would be potentially in the millions of dollars and there are no alignments through the area that would not present a great potential for adverse environmental impact.

The Rochester Pure Waters (overseers of the sanitary sewer system), requires that no permanent structures can occur within their easement for the force main. The hotel has been sited so that the foundation walls will abut the east easement line. The canopy over the drop-off is intended to span the easement so that its footings will be placed on the west easement line. In discussions with Pure Waters, the developer has agreed that the canopy will be designed to be removable and

will be removed at the Owner's expense in the event that Pure Waters will require access to the sewer for maintenance or repair purposes. No permanent structures will be placed within the sewer easement.

Option 1, depicted on Figure 6, shows the location of the hotel as it is currently planned in this alternative. The proposed siting of the hotel takes advantage of the topographic characteristics of the site. The hotel is tucked behind the residential structures along Genesee Street that sit approximately 15-20 feet higher in elevation than the river and South Plymouth Avenue. The majority of the traveling public on South Plymouth Avenue will view the narrow end of the hotel. Frontal views of the hotel will occur from the river or across the river, where distance and shoreline vegetation will help mitigate its impact. Visual access to the river and the University of Rochester would be maintained.

Option 2 (Figure 7) has been considered since it also avoids the force main. This alternative places the hotel in front of the river at the intersection of Brooks Avenue and Genesee Street. The restaurant is located to the south of the hotel. The 4-story hotel in this location would largely block views of the river from the intersection as well as for much of the surrounding neighborhood. The only public visual connection to the river (one of the major objectives for the redevelopment from the neighborhood's point of view) from this commercial center would be significantly diminished. As noted in a letter from Sector 4 Community Development Corporation (Appendix M), during the early public outreach phases of the project, the neighborhood expressed a strong desire to maintain views to the river and the University of Rochester campus from their side of the river (Figure 21). The neighborhood felt that a strong visual connection to the area's major aesthetic and recreational resource, the Genesee River, as well as the area's major economic resource, the University of Rochester and Strong Memorial Hospital, would go a long way in helping to revitalize the area.

An historical reference exists regarding views to the river from the surrounding area from an account in the life of Susan B. Anthony¹. That view is still present today from Brooks Avenue, and one that is valued by the neighborhood (Figure 22).

The location of the hotel as shown on Option 2 (Figure 7) would preclude vehicular access to the site from South Plymouth Avenue since the only entry that could occur off South Plymouth would be too close to the intersection. The location of the restaurant south of the hotel (adjacent to the park) and closer to the adjacent residential structures was not considered to be suitable from a land-use perspective. Although the restaurant's height is lower than the hotel, the use is more intense and occurs during hours that may conflict with adjacent residential uses. The more active use that the restaurant supports was seen as more appropriate near the intersection and away from the residential units. The proposed hotel is characterized as an 'extended-stay' hotel with full suite amenities that accommodates visitors for longer periods of time than a typical hotel. The hotel will not have any conference or meeting facilities. The passive nature of the

¹ In 1845, the Anthony family moved to Rochester aboard a canal boat and settled in the area. In the April, 1945 *Rochester History* publication, it was noted that 'From the [Susan B. Anthony] house, standing atop a gentle elevation (near the intersection of the present Brooks Avenue and Genesee Park Boulevard), one could look east towards the curving Genesee.'

hotel draws many similarities to the adjacent residential use and is therefore considered a more appropriate use adjacent to the bordering residences.

Option 3 (Figure 8) was also considered unpractical. Besides the impact to the neighborhood view of the river and no access from South Plymouth Avenue, this option places the hotel squarely over the force main, which is not feasible. Option 4 (Figure 9) was the least desirable configuration since it places a portion of the hotel over the force main, it is the greatest obstruction to the neighborhood view of the river, it prevents access to the site from Genesee Street, and the scale and massing of the 4-story hotel in this location adjacent to the street is inconsistent with the existing typology of the 2-story commercial urban fabric and residential structures along Genesee Street.

Of the 2.77 acres required for the hotel and restaurant development site, approximately 1.38 acres is dedicated 6(f) parkland (Figures 35 and 50). The remaining 1.39 acres is City-owned vacant land (the former canal and railroad right-of-way) adjacent to the parkland. The 1.38 acres of dedicated 6(f) parkland is comprised of approximately 0.68 acres of lawn area and 0.7 acres of paved roadway and sidewalks that make up South Plymouth Avenue and adjacent open space.

B. Brooks Landing Public Waterfront and Promenade (Public Improvement Project)

The Brooks Landing Public Waterfront and Promenade will be located along the west shore of the Genesee River. The Promenade will occur within a 30-foot wide strip of parkland that runs parallel to the river at the river's edge. A 20-foot wide landside promenade with specialty paving will extend the frontage of the Riverfront Commercial District (the hotel and restaurant site) starting from approximately the South River Pedestrian Bridge landing over the Genesee River and connecting with the existing Genesee Riverway Trail along the river in Genesee Valley Park². The promenade will provide a major nodal space along the Genesee Riverway Trail, with amenities including benches, shade trees, signage, public art, and lighting. Shade trees and other landscaping will blend the promenade into the hotel and restaurant development and the existing Genesee Riverway Trail in Genesee Valley Park to the south. The Promenade will occupy approximately 0.6 acres of existing 6(f) parkland (see Figures 35 and 50). The area will be open to the public 24 hours/day, seven days/week. It will therefore remain as 6(f) parkland.

The proposed facilities will provide accommodations for a variety of excursion-type vessels that typically are found on the Erie Canal/Genesee River system, such as the Sam Patch and Colonial Belle. These vessels are most often used for sight seeing and dinner cruising, and offer no provisions for overnight accommodations. The excursion-type vessels will be moored against a pile-support marginal wharf system adjacent to the promenade in a side-to arrangement. The wharf will extend 16 feet riverward, and extend 175 feet along the existing river wall (Figures 4, 10 and 11). These berths will be designed to meet Americans with Disabilities Act Accessibility Guidelines for Buildings and Facilities (ADAAG) requirements.

² This is not the same trail as the Genesee Valley Greenway Trail. The Greenway Trail begins just north of the junction of the Erie Canal with the Genesee River, and heads south. The Greenway Trail start point is south of the project area. The Genesee Riverway Trail extends along both sides of the Genesee River, and begins just south of the junction of the Erie Canal with the Genesee River (Figures 12 and 13)

In addition, accommodations will be provided for a limited number of recreational-type boats. The number of boats accommodated will be dependent on the size of vessel. Two to four recreational craft will be able to berth along the wharf provided for the excursion-type vessels. Utility services will include electrical service, and potable water. No sanitary pump-out and no fueling facilities will be provided at the site.

The site will be configured to allow for future expansion of the docking facilities for recreation craft. No boat launch area will be provided.

Construction is anticipated to commence in fall 2005, and be completed in fall 2006. Construction will be phased to accommodate both the winter period and any work-in-water restrictions that may apply.

C. South Plymouth Avenue Realignment

The south termination of South Plymouth Avenue within the park (south of the project site) will be a teardrop cul-de-sac. This design is a more suitable termination for the park road. This configuration will provide for an easy flow of traffic consistent with a leisurely park drive. The turn-around will be wide enough to accommodate approximately 10 on-street parking spaces for Riverway trail use or during ball games at the nearby fields. It will also be curbed to match the existing park road. Consistent with the wishes of the neighborhood to maintain vehicular access from the Brooks/South Plymouth intersection south to Elmwood Avenue, a driveway connection will be provided to the hotel parking lot from the cul-de-sac. The driveway will be of minimum width to downplay its presence and discourage cut-through traffic through the hotel site for the majority of traffic using South Plymouth Avenue (refer to Figure ES-5). Non-park uses of South Plymouth Avenue within Genesee Valley Park (south of the project site) will be discouraged.

Improvements associated with the Brooks Landing project will take place at the following intersections: (1) Brooks Avenue/Genesee Street, (2) Genesee Street/Genesee Park Boulevard, (3) Genesee Street/Elmwood Avenue/Scottsville Road, and (4) Elmwood Avenue/South Plymouth Avenue.

The project involves reconstruction of Brooks Avenue from its intersection with South Plymouth Avenue to its intersection with Genesee Street and the removal of the Brooks Avenue/South Plymouth Avenue intersection and a portion of South Plymouth Avenue.

New pavement, curbing, sidewalks, street lighting, traffic signals and pavement markings will be added to the public streets in the following sequence (see Figure ES-2 for intersection locations):

- Complete right-of-way lane, striping, utilities, width and traffic signal improvements at all affected intersections necessary to close off the portion of South Plymouth Avenue between Brooks Avenue and Elmwood Avenue for subsequent project construction.
- Close off the portion of South Plymouth Avenue between Brooks Avenue and Elmwood Avenue. Remove the portion of South Plymouth Avenue within the project boundary.

- Realign South Plymouth Avenue (north of Brooks Avenue) to the Brooks Avenue/Genesee Street intersection.
- Terminate the remaining South Plymouth Avenue park road (south of the project site, within the park) with a cul-de-sac.

The street improvements will involve some new right-of-way. Additional right-of-way takings include a 210-foot long by 1-foot wide strip at the residential home at 31 Scottsville Road. A 250-foot long by 12-foot wide strip will be taken along the south side of Brooks Avenue at South Plymouth Avenue. Finally, a 125-foot long by five foot wide strip will be taken along the north side of the same intersection.

South Plymouth Avenue south of Brooks Avenue will be removed and abandoned. This section of South Plymouth Avenue is categorized as a park road and would not require formal abandonment procedures.

2.2.3 Sub-Area II.

As described in the “Brooks Landing Urban Renewal Plan (URP)” (City of Rochester Economic Development Department, 2002) (Appendix D), Sub Area II will consist of a new one-story 20,000-25,000 SF office and retail building.

This development has not proceeded past the conceptual level, but the development will include related parking amenities and site improvements, including accessible pedestrian routes, landscaping to buffer the site and parking to satisfy the requirements for the C-1 Neighborhood Center District as regulated by Article XX of the Rochester Zoning Code and amended in the URP. This project will combine up to 12 currently existing parcels into one development parcel.

2.2.4 Sub-Area III.

As described in the “Brooks Landing Urban Renewal Plan” (City of Rochester Economic Development Department, 2002) (Appendix D), Sub-Area III incorporates two existing parcels on the west side of Genesee Street north of Brooks Avenue to create a 6,000 SF renovated mixed-use retail building with parking and outside dining area. The structures are proposed to be rehabilitated to improve their commercial viability while maintaining the neighborhood character. Sub-Area III also includes mixed in-fill development on up to four lots along the west side of Genesee Street north of Brooks Avenue.

2.2.5 Replacement Parcel

The proposed replacement parcel for the conversion is located adjacent to and north of Turning Point Park along the Genesee River (Figures 46 and 47). It consists of 19.5 acres of undeveloped river shoreline, of which approximately 3.1 acres are steep vegetated slopes, and 16.4 acres are wetland and open water area along 3000 linear feet of shoreline. A CSX railroad and a residential neighborhood bound the land to the west. North of the replacement parcel is land-locked 6(f) parkland (known as Turning Point Park North) that is accessible only by boat.

2.3 Preferred Alternative

Alternative 2 is the preferred alternative because it best meets the purpose and need for the project as presented in Section 1.3. The primary need for the project has revolved around the need for revitalization and economic development in the neighborhood. This was the primary need in the various planning documents discussed in Section 1.2. Previous attempts at a development project in this area over the past twenty years have been unsuccessful, and it has been the connection to the Genesee River and the resources in the area that have made the project viable. This alternative has been developed to meet other aspects of the purpose and need as well. Other actions could be developed to satisfy other aspects of the purpose and need, such as promoting the use and awareness of local and regional cultural resources; however these would not fulfill the primary purpose and need for the neighborhood.

The City of Rochester would not support the conversion of parkland without careful consideration. There are several reasons why the Brooks Landing development will not set a precedent for park conversion elsewhere.

First, the Brooks Landing Revitalization Project is distinctive in its location in relation to the Genesee River and Genesee Valley Park West. There are other neighborhoods in the City of Rochester that are in need of economic development. However, there are no other known sites that are in such a unique location proximate to the Genesee River, parkland and a distressed commercial district in need of revitalization.

Secondly, the City and local neighborhood organizations have invested substantial time and resources to plan a development which will enhance the land and surrounding resources, stimulate economic investment and mitigate potential environmental impacts. This project is a result of twenty years of planning, beginning with the development of the Genesee River South Corridor Plan in 1986, and continuing with the design and construction of the pedestrian bridge in the early 1990's. The mechanisms in place at the federal, state and local levels have all been effective to ensure that the use of parkland and open space along the river is not taken without due cause.

Finally, Brooks Landing has received wide support from many of the interest groups that would normally oppose any sort of development near such resources. The Sector 4 Community Development Corporation, the Genesee Corridor Business Association, the University of Rochester, the 19th Ward Community Association, the Landmark Society of Western New York and numerous individual local residents have publicly supported this project and have spent many hours providing input toward a suitable concept and design for the development. Conversion of parkland of any amount would typically be unacceptable to local stakeholders. The unilateral local support of the Brooks Landing Revitalization Project proves that it is a unique case.

Implementation of Alternative 2 is not expected to set a precedent, or make it easier for a future project to be undertaken along the river or to utilize parkland. Indeed, should such a project develop, it would have to prove its value by locating in an area with waterfront access and a

commercial center in need of revitalization, by undergoing a careful review by federal, state and local agencies, and by obtaining unilateral public support.

Among the factors to consider in Section 650.2.9.A of the Land and Water Conservation Fund (LWCF) Grants-in-Aid Manual, there are two that could apply to Alternative 2:

- *The proposed LWCF project would or might result in major natural or physical changes, including interrelated social and economic changes and residential and land use changes, with the project area or its immediate environs.*
- *An archeological or historical site on, or eligible for nomination to the National Register of Historical Places would be subjected to significant adverse effects by the proposed project.*

Alternative 2 would result in some physical changes for the project area and its immediate environs. However, these would result in primarily beneficial changes. This is particularly true of social and economic changes (Section 4.12.2). The project would remove a portion of South Plymouth Avenue through the current parkland, which would reduce the high volume of traffic through this area. With improvements to the local transportation system to be performed in conjunction with Alternative 2, the impact of traffic to the local streets would be successfully mitigated (Sections 4.8.2 and 5.5). This would also contribute to the mitigation of any impacts to air and noise that could otherwise be caused by the change in traffic patterns. A loss of vegetation in the project area would be mitigated with additional plantings as shown on the landscape plan for the project (Section 5.1). The project would change the transportation and public right-of-way/open space use of the 1.38-acre 6(f) conversion parcel by the removal of a portion of South Plymouth Avenue and its sidewalk and right-of-way. This would be replaced by the addition of 19.5 acres of land adjacent to Turning Point Park along the Genesee River (see Figures 46 and 47). Furthermore, the transportation and public right-of-way/ open space use of the conversion parcel would be replaced with new and different recreational and commercial opportunities, including access to recreation opportunities on/in the Genesee River through the waterfront development, enhanced access to the Genesee Riverway Trail, and commercial development supporting and enhancing the recreational opportunities (Sections 4.7.2 and 5.4).

The location for the project area is rich in historic and cultural background, and there are resources within the Area of Potential Effect for the project that have been determined to be eligible for the National Register of Historic Places. For most of these resources, there would be no adverse impacts resulting from the project, especially in light of mitigation measures for visual resources (see Sections 4.5, 4.6, 5.2 and 5.3). Furthermore, a number of recommendations have been made for treatment for the purpose of mitigating cultural resource impacts in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (1966), including preservation, restoration, reconstruction and rehabilitation. A Memorandum of Agreement has been signed by the appropriate consulting parties to complete the Section 106 process in compliance with the National Historic Preservation Act (Appendix G).

2.4 Alternatives Considered But Rejected

The CEQ requires that the alternatives considered are “reasonable,” and that unreasonable alternatives are eliminated before impact analysis begins. Unreasonable alternatives may include those that are expensive, cannot be implemented for technical or logistical reasons, do not meet a NPS mandate, are inconsistent with carefully considered, up-to-date NPS statements of purpose and significance or management objectives, or have severe environmental impacts (DO-12 Handbook). The alternatives for Brooks Landing that were considered in this process and subsequently rejected are described below.

2.4.1 Locate the hotel and restaurant along Genesee Street

This alternative would also require a conversion of parkland, as there is not sufficient space for the development without it. This alternative would block the view of the Genesee River from more of the neighborhood area than the location of Alternative 2. Also, it would expose the parking area as a more prominent visual feature of the river corridor.

2.4.2 Locate the hotel development on a site downstream from the project area

This is the only alternative that does not include the conversion of parkland to facilitate new development in the area. The City owns approximately 2.1 acres along South Plymouth Avenue approximately one-third of a mile downriver (north) and around a bend on the Genesee River (see Figure 14). This site is not large enough itself to accommodate the hotel, restaurant and parking. Acquisition of a 2.66-acre privately-owned industrial property to the south and east was considered. This alternative was rejected for the following reasons:

- The site is too far removed from pedestrian and visible access to the University of Rochester, Strong Medical Center, the commercial intersection of Brooks Avenue/Genesee Street and the pedestrian bridge landing at Brooks/Plymouth Avenue. The pedestrian bridge and its western landing was strategically placed as a direct result of the South River Corridor Plan to connect the University with the commercial intersection of Brooks/Plymouth/Genesee Street. It is not in conformance with the South River Corridor Plan and the development resulting from this plan.
- This site was identified for University housing or parkland in the South River Corridor Plan (Appendix A).
- The site does not link the Brooks/Genesee neighborhood center to the waterfront.
- The adjacent land uses are primarily residential on all sides, and the site is essentially flat, offering little opportunity for buffering resulting from topographic features.
- The development of this site would require the disturbance and removal of greater acreage of wooded, naturalized areas immediately adjacent to the river.

- There is greater potential to damage existing historic/archaeological resources (remnants of early canal walls exist on this site).
- The river shore in this location is not as favorable for a boat landing due to the narrower navigational channel in this part of the river.

2.5 Environmentally Preferred Alternative

The environmentally preferred alternative is the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historic, cultural, and natural resources. When identifying the environmentally preferred alternative, economic, recreational, and technical issues are not considered. The environmentally preferred alternative is the alternative that will promote the national environmental policy expressed in NEPA (Section 101(b)) as the alternative that will help the Nation:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
2. Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
3. Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
4. Preserve important historic, cultural, and natural aspects of our national heritage, and maintain, wherever possible, an environment which supports diversity, and variety of individual choice;
5. Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Alternative 2 best fulfills the responsibility of this generation as trustee of the environment for succeeding generations. This is based primarily on the overall theme of the objectives to revitalize the area, which will enhance the resources in the area and make them more accessible for present and future generations.

For the second objective, both Alternatives 1 and 2 maximize the assurance of safety and health. However, Alternative 2 provides more productive, aesthetically and culturally pleasing surroundings, as documented in Sections 4.5, 4.7 and 4.12 and seeks to fulfill Campaign 9-Healthy Urban Neighborhoods of the City's 2010 Renaissance Plan.

For the third objective, Alternative 2 aspires to the widest range of beneficial uses of the environment without degradation or risk to health and safety. The purpose for Alternative 2

includes the city-wide objective to better utilize its dynamic local waterfront resources and promotion of the use and awareness of the Erie Canalway National Heritage Corridor.

For the fourth objective, Alternative 1 may best preserve important historic, cultural, and natural aspects of our national heritage, in that historical and cultural remains would not be further disturbed. However, as mentioned for the third objective, the purpose includes promotion of the use and awareness of the Erie Canalway National Heritage Corridor. Alternative 2 helps maintain an environment which supports diversity and variety of individual choice. This is particularly evident with the addition of the biologically diverse and natural 19.5 acres to Turning Point Park as part of the LWCF conversion process (see Section 4.7). The alternative that best meets the fourth objective is therefore debatable.

For the fifth objective, Alternative 2 achieves a better balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities. Better utilization and awareness of the area resources is part of the purpose for Alternative 2.

For the sixth objective, Alternative 1 utilizes the fewest depletable resources of the alternatives. Alternative 2 would utilize depletable materials for construction that would not be needed in Alternative 1, although over time, more efficient use of energy would be expected for Alternative 2, which would tend to level the difference between these alternatives in obtaining this objective.

Alternative 2 is considered the Environmentally Preferred Alternative, as it best meets four to five of the six NEPA objectives.